

EXHIBIT F

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JENNIFER DOLD, personal)
representative of the estate)
of Alexander Dold; and)
KATHY DUNCAN,)

Plaintiffs,)

vs.)

NO. 2-20-cv-00383-RAJ

SNOHOMISH COUNTY, a political)
subdivision of the State of)
Washington; BRYSON McGEE; and)
CODY McCOY,)

Defendants.)

REMOTE VIDEO RECORDED DEPOSITION UPON ORAL EXAMINATION OF
MARK WILLIAM KROLL, PhD

WEDNESDAY, JANUARY 27, 2022

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1 Q And you wouldn't consider yourself competent to treat
2 schizophrenia; would you?

3 A No.

4 Q And just to clarify, you're saying "no" meaning "no, I
5 would not consider myself competent;" right?

6 A Agreed.

7 Q Would you consider yourself competent to diagnose or
8 treat any particular mental illness?

9 A No.

10 Q You've done research about the effects of tasers on live
11 human beings; correct?

12 A Yes.

13 Q In any of your research on that subject, to your
14 knowledge, did you have any subjects in your experiments
15 who were suffering from schizophrenia?

16 A Yes.

17 Q Tell me about that.

18 A 25 percent who resist arrest or control suffer from
19 schizophrenia, bipolar disease or schizoaffective
20 disorder. And then numerous large studies of
21 arrest-related deaths and so include by necessity a
22 large number of people with those terrible mental
23 illnesses.

24 Q Okay, I don't understand, but maybe you could tell me.
25 In these studies you're referring to that you did, did

1 A Well, it doesn't specifically say that. That is a
2 common question that is asked in studies, because it's
3 considered unethical to do any kind of clinical study on
4 people that are pregnant or are schizophrenic.

5 Q Are you able to say anything about what screening
6 questions actually were asked in your study?

7 A Not from this specifically. But I know from past
8 experience with other studies what the typical questions
9 are.

10 Q Okay. And from past experience in other studies, you
11 believed that typically people are asked if "you have
12 any mental illness;" is that correct?

13 A I can't say that for sure.

14 Q Well, what can you say about --

15 A -- Well, what I can say, I consider it unethical to do
16 clinical studies on schizophrenics. Maybe that will
17 save a little time here. You don't have clinical
18 studies for schizophrenics except for, generally for
19 psychiatric medications, if that's helpful.

20 Q I think that's helpful. If I'm understanding you,
21 you're saying it would be unethical generally to do a
22 study like this using schizophrenics as subjects?

23 A Right, and for two reasons. One, you have the cost
24 benefit. We know that there is, there's no benefit
25 because schizophrenia lies in the brain, and

1 electrocution risk lies with the heart. So, there's no
2 connection. People with mental illness do not have any
3 more or less sensitivity to electricity or
4 electrocution. So, there's no benefits; so this would
5 never get past the first cut-off at my university, for
6 example.

7 Q Several minutes ago you mentioned sort of three areas of
8 mental illness: I think schizoaffective disorders,
9 bipolar disorders and schizophrenia; correct?

10 A Yes.

11 Q Okay. And so would the same thing be true that
12 generally speaking it would be unethical to include
13 people with bipolar disorder in your studies?

14 A Yes. And again, for, for the main reason there's no
15 benefit, and there's no difference. The mental disease
16 does not affect how your body responds to electricity.
17 So, it -- There would be no benefit, so you would never
18 get it past your Institutional Review Board.

19 Q The same thing would be true with the people with
20 schizoaffective disorders?

21 A Yes.

22 Q And these are all police officers in this study you did
23 in 2009; right?

24 A Correct.

25 Q So, it would be safe to assume, wouldn't it, that there

1 mechanisms?

2 A Yes.

3 Q Do you have any expertise in endo...?

4 A Endocrinology?

5 Q Yeah, thanks.

6 A No.

7 Q Has any Court ever ruled that you are qualified to give
8 an expert opinion about physiology?

9 A I'm not sure if they used that term, but most of my
10 court opinions deal with physiological effects of
11 electricity, so I think the simplest answer would be,
12 yes.

13 Q So, let me put it a different way. Has anyone ever gone
14 to court with an argument that you are not qualified as
15 an, as an expert in physiology?

16 A I don't know if that term was ever used. I don't recall
17 a case, an example of that.

18 Q So, you don't recall an example of anyone ever making
19 that argument?

20 A Specifically with the term physiology, I do not recall
21 anyone making such an argument.

22 Q Do you consider yourself qualified to give an expert
23 opinion in the area of physiology?

24 A In regards to electrophysiology, absolutely. And
25 bioelectricity, absolutely.

1 Q Okay. You seem to have carved out a couple areas where
2 the answer's yes. Are there any other areas of
3 physiology where you feel qualified?

4 A I -- Over the last five years I've done a fair bit of
5 research on biomechanics, and I would say those three
6 would pretty much cover it.

7 Q Sorry. What are the three biomechanics? One was
8 electricity?

9 A Yeah, and electrophysiology, which is specifically
10 bioelectricity clinically as it applies to the heart.

11 Q Okay. Biomechanics, electrophysiology. And what else;
12 what's the third one?

13 A General bioelectricity.

14 Q I'm sorry, I seem to have, like, two. Biomechanics,
15 general, general --

16 A -- Bioelectricity.

17 Q General bioelectricity and electrophysiology?

18 A Yes. And the third one is really a subset of the second
19 one, but it's important enough that I like to list it
20 separately.

21 Q Which one is the smaller one, the subset of the larger
22 one?

23 A Well, electrophysiology is smaller due to the fact it
24 applies to the heart. In terms of clinical relevance,
25 it's actually the larger one.

1 Q Which one is the subset of the other?

2 A Bioelectricity is a general study of effects of
3 electricity on the human body. Electrophysiology,
4 specifically cardioelectrophysiology is a subset of
5 bioelectricity deals with effects on the heart.

6 Q Okay. Anything else?

7 A That covers the main three.

8 Q Are there any other areas of physiology where you feel
9 qualified to testify as an expert?

10 A That covers the main three. There's other, there's
11 other areas I've published -- I've been researching and
12 publishing a long time, so I can just tell you those are
13 the main three.

14 Q Well, can you think of another one?

15 A Not right now.

16 Q Okay. And you just called them three again. You said
17 something like "I like to call them three but one is
18 really a subset of the other." Did I get that right?

19 A Yes.

20 Q So, why do you call them three instead of two, if one is
21 inside the other?

22 A Well, I think I answered that pretty well, but to
23 clarify... When we're dealing with cardiac
24 electrophysiology issues, electrical stimulation of the
25 heart, for example, or electrocardiography, the roots of

STATE OF WASHINGTON)
) ss.
COUNTY OF SNOHOMISH)

I, CARRIE. J. DEHUFF, Court Reporter in and for the State of Washington do hereby certify that the foregoing proceedings heard in the above-entitled and numbered cause, on the 27th day of January 2022, at Auburn, Washington, was reported by me on said date and reduced to typewriting under my directions.

I do further certify that said transcript of proceedings, as above transcribed, is a full, true and correct transcript of my machine shorthand notes of the aforementioned matter.

WITNESS MY HAND AND SEAL, this 4th day of
February 2022.

C. P. Dehuff

Court Reporter in and for
the State of Washington,
residing at Auburn.
CSR #2532